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Attorneys for plaintiffs (listing continues on following page)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

| | | | |
|---------------------------------------|---|-----------------------------------|------------------------|
| JENNY LISETTE FLORES, <i>et al.</i> , |) | Case No. CV 85-4544 DMG (AGRx) | ^[11] SEP |
| |) | | |
| Plaintiffs, |) | APPLICATION FOR LEAVE TO FILE | |
| - vs - |) | MOTION TO ENFORCE SETTLEMENT AND | |
| |) | EXHIBITS IDENTIFYING CLASS MEMBER | |
| WILLIAM P. BARR, ATTORNEY GENERAL |) | ASYLUM APPLICANTS AND GOVERNMENT | |
| OF THE UNITED STATES, <i>et al.</i> , |) | EMPLOYEES UNDER SEAL; DECLARATION | |
| |) | OF CLASS COUNSEL | |
| Defendants. |) | | |
| _____ |) | [HON. DOLLY M. GEE] | |

1 *Plaintiffs' counsel, continued:*

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1 This is an application seeking leave to file in the public record the Declarations
 2 of asylum seekers, Plaintiffs' Motion to Enforce, and Memorandum in Support of
 3 Plaintiffs' Motion to Enforce the Settlement identifying such asylum seekers with
 4 identifying information redacted so as to protect the identities of applicants for asylum.
 5 Pursuant to 8 C.F.R. §§208.6 and 1208.6 the identities of asylum applicants are
 6 confidential. Defendants have agreed that all filing containing personal identifying
 7 information regarding class members or their parents may be filed under seal in this
 8 case. Plaintiffs also seek to redact identifying information to protect the identities of
 9 certain Government employees.
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13 Exhibit declarations have been gathered from class members up to and including
 14 Friday March 29, 2019. See Declaration of Peter Schey filed herewith.
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16 A proposed Order granting this application is lodged herewith.

17 Dated: May 31, 2019

Respectfully submitted,

18 CENTER FOR HUMAN RIGHTS &
 19 CONSTITUTIONAL LAW
 20 Peter A. Schey
 21 Carlos Holguín

22 ORRICK, HERRINGTON & SUTCLIFFE LLP
 23 Elena García

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 27 LEGAL ADVOCATES FOR CHILDREN & YOUTH
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Of counsel:

YOUTH LAW CENTER
Virginia Corrigan

/s/ Peter Schey
Attorneys for Plaintiffs

///

CERTIFICATE OF SERVICE

I, Peter Schey, declare and say as follows:

I am over the age of eighteen years of age and am a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state. [L] [SEP]

On May 31, 2019, I electronically filed the following document(s):

- APPLICATION FOR LEAVE TO FILE MOTION TO ENFORCE SETTLEMENT AND EXHIBITS IDENTIFYING CLASS MEMBER ASYLUM APPLICANTS AND GOVERNMENT EMPLOYEES UNDER SEAL

with the United States District Court, Central District of California by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Peter Schey
Attorney for Plaintiffs